

EXHIBIT A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IAN POLLARD, on behalf of himself)	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:13-cv-00086-ODS
)	
REMINGTON ARMS COMPANY, LLC, et al.)	
)	
Defendants.)	
_____)	

DECLARATION OF STEVEN WEISBROT

1. I am Executive Vice President of Notice & Strategy at the class action notice and Settlement Administration firm, Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.

2. As previously reported to this Court, I have been responsible in whole or in part for the design and implementation of more than one hundred class action administration plans and have taught numerous Accredited Continuing Legal Education courses on the Ethics of Legal Notification in Class Action Settlements, using Digital Media in Class Action Notice Programs, as well as Class Action Claims Administration, generally. Additionally, I am the author of frequent articles on Class Action Notice, Digital Media, Class Action Claims Administration and Notice Design in publications such as *Bloomberg*, *BNA Class Action Litigation Report*, *Law360*, the ABA Class Action and Derivative Section Newsletter and private law firm publications.

3. My notice work comprises a wide range of class actions that includes product defect, false advertising, employment, antitrust, tobacco, banking, firearm, insurance, and bankruptcy cases. Likewise, I have been instrumental in infusing digital and social media, as

well as big data and advanced targeting into class action notice programs where, as here, we only have direct notice information for a portion of the class. For example, the Honorable Sarah Vance stated in her December 31, 2014 Order in *In Re: Pool Products Distribution Market Antitrust Litigation (MDL No. 2328)*:

To make up for the lack of individual notice to the remainder of the class, the parties propose a print and web-based plan for publicizing notice. The Court welcomes the inclusion of web-based forms of communication in the plan....The Court finds that the proposed method of notice satisfies the requirements of Rule 23(c) (2) (B) and due process.

The direct emailing of notice to those potential class members for whom Hayward and Zodiac have a valid email address, along with publication of notice in print and on the web, is reasonably calculated to apprise class members of the settlement.

As detailed below, courts have repeatedly recognized my work in the design of class action notice programs:

- (a) For example, on May 12, 2016 in his Order granting preliminary approval of the settlement in *In Re Whirlpool Corp. Front Loading Washer Products Liability Litigation (MDL No. 2001)*, The Honorable Christopher A. Boyko stated:

The Court, having reviewed the proposed Summary Notices, the proposed FAQ, the proposed Publication Notice, the proposed Claim Form, and the proposed plan for distributing and disseminating each of them, finds and concludes that the proposed plan for distributing and disseminating each of them will provide the best notice practicable under the circumstances and satisfies all requirements of federal and state laws and due process.

- (b) *Sateriale, et al. v R.J. Reynolds Tobacco Co.*, Case No. 09-cv-08394-CAS (C.D. Cal.)

Honorable Christina A. Snyder (May 3, 2016) The Court finds that the Notice provided to the Settlement Class pursuant to the Settlement Agreement and the Preliminary Approval Order has been successful, was the best notice practicable under the circumstances and (1) constituted notice that was reasonably calculated, under the circumstances, to apprise members of the Settlement Class of the pendency of the Action, their right to object to the Settlement, and their right to appear at the Final

Approval Hearing; (2) was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to receive notice; and (3) met all applicable requirements of the Federal Rules of Civil Procedure, Due Process, and the rules of the Court.

(c) *Ferrera et al. v. Snyder's-Lance, Inc.*, Case No. 0:13-cv-62496 (S.D. Fla.)

Honorable Joan A. Lenard (February 12, 2016) The Court approves, as to form and content, the Long-Form Notice and Short-Form Publication Notice attached to the Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement as Exhibits 1 and 2 to the Stipulation of Settlement. The Court also approves the procedure for disseminating notice of the proposed settlement to the Settlement Class and the Claim Form, as set forth in the Notice and Media Plan attached to the Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement as Exhibits G. The Court finds that the notice to be given constitutes the best notice practicable under the circumstances, and constitutes valid, due, and sufficient notice to the Settlement Class in full compliance with the requirements of applicable law, including the Due Process Clause of the United States Constitution.

4. The purpose of this Declaration is to respond to the undated letter of Todd B. Hilsee, filed on July 29th 2017 (ECF Entry No. 135), where Mr. Hilsee purports to find several “significant” problems that he charges were “not reported” to this Court with regard to the previously-approved Due Process Notice Program. I will address these in turn. However, Mr. Hilsee, whether by design or simply because he did not have all the proper information at his disposal, levels accusations that are objectively false, rife with misinformation, and derived from a foregone era of media consumption—the only era during which Mr. Hilsee ever actually professionally planned or implemented notice campaigns.

5. As this Court is aware, this case concerns the diminution of value of certain Remington Rifles. This is not a case about personal injury or wrongful death. Mr. Hilsee attempts to transform this settlement into something that it is not by using colorful language and

dramatic admonitions.¹ However, this is not a personal injury case and I am advised by counsel that not a single potential class member has been asked to release any claims that would arise as a result of the calamitous consequences that could occur should they, or a family member, be the ill-fated victim of an unsafe rifle. Rather, this is a case about the monetary value of a rifle. Obviously, had this been a personal injury action, I would harbor the very same grave concerns about class member safety that Mr. Hilsee offers—who wouldn’t? However, histrionics aside, this is a case where class members are entitled to receive monetary damages or a retrofit of their trigger mechanism, if they bought an allegedly defective product for more money than they otherwise would have paid. The Due Process notice plan must be evaluated in light of the subject matter of the settlement—not via an inflammatory lens which is clearly designed to impassion this Court.

6. For instance, out of the countless consumer class action settlements granted final approval in federal courts, Hilsee chooses a single atypical example for this Court to use as a model when evaluating the adequacy of the proposed settlement. Hilsee’s erroneous suggestion that this Court would benefit from information related to the *Swiss Banks*² notice campaign – a high profile, consolidated, class action to recover dormant bank accounts and to press human rights and other claims against Swiss banks for their role in laundering gold and other assets taken from victims of Nazi persecution – in evaluating the adequacy of this settlement class,

¹ This is not the first time Mr. Hilsee has objected to a settlement and sought to re-cast its essential elements in scandalous terms for his own benefit. See e.g. *In Czuchag v Conair Corporation*, 13-cv-01901-BEN-RBB (S.D. Cal.), “Declaration of Daniel Burke,” Docket Entry 208-2 (Feb. 12, 2016) (“The documents filed in opposition to the proposed notice plan repeatedly refer to the Defendant’s product as ‘handheld flamethrowers,’ claiming that it is the Plaintiffs’ responsibility and duty to inform the Class of this issue. This class action is not about personal injury or property damage, however, and one assumes the onus would be on Defendant to issue a proper recall notice if Defendant is aware that their product was defective.”).

² *In Re Holocaust Victim’s Assets Litigation (Swiss Banks)*, consolidated in the United States District Court for the Eastern District of New York, Master Docket No. 96-cv-4849.

seeking only to recover the economic loss suffered from the diminution in value of their firearms, even if well intentioned, is absurd. It would be virtually impossible to repeat the highly effective notice plans in *Swiss Banks* without requiring parties to dedicate tens, if not hundreds, of millions of dollars to the cost of notice³ – an unreasonable cost alone that would discourage settlement. Simply stated, *Swiss Banks* is an anomaly. To suggest that it should be the standard neglects the horrific underlying circumstances and unparalleled global efforts that made the notice plan in *Swiss Banks* reasonable.

7. Mr. Hilsee also places excessive reliance on the FJC guidelines which he helped to design. This is not just self-serving, it is an erroneous exposition of the law by a non-lawyer, non-party to this settlement. The Federal Judicial Center publications, which Mr. Hilsee reminds us that he advised upon⁴ are not binding upon this Court. Repeatedly relying on propositions found in those publications to frame the alleged misgivings of the due process notice plan that this Court has already approved, allows Mr. Hilsee a platform to not-so-subtly tout his own achievements. However, despite much of the sound advice in the FJC publications, the operative legal standard under which this Court evaluated, and should continue to evaluate, the Due Process Notice Program, is whether the notice program was “the best notice practicable”, as clearly delineated in the Federal Rules. This standard seems to be far less important to Mr. Hilsee.⁵

³ See, *Id.*, “Report of Jerry Benjamin,” Master Docket Entry 354 (concluding that the collective success of community efforts was “unparalleled”) (Nov. 5, 1999); *See also, Id.*, “Report of Todd Hilsee,” Master Docket Entry 355 (Estimating tens of millions in savings and identifying the reach as “extraordinary”) (Nov. 5, 1999).

⁴ The term “FJC” appears in the Hilsee Letter 46 unique times.

⁵ The phrase “best notice practicable” appears 3 times in the 42 page Hilsee Letter.

8. Mr. Hilsee's letter, amongst its 42 pages, levels essentially two main criticisms as to the underlying Due Process Notice Program; that the reach was erroneously reported and that there was insufficient use of individual notice. Neither of these claims is objectively verifiable.

REACH

9. **Reach Methodology:**

Reach in this case was properly calculated and authenticated via leading media industry software incorporating objective third-party syndicated data. Specifically, in order to authenticate and report the reach percentage of the Due Process Notice Program to this Court, IMS CampaignRF® ("IMS") was utilized. IMS is a multimedia reach and frequency tool that allows professional media planners to combine two or more media schedules to determine total campaign results, based on the specifics of a marketing target—in this case Rifle Owners. The individual reach of media forms were not merely added or combined, as misleadingly claimed in the Hilsee Letter. Rather, each media schedule was input into this tool as a separate schedule to maintain the integrity of the overall reach calculation. It is objectively verifiable that the reach in this case meets or exceeds other similar notice plans for similar settlements.

10. **Target Audience and Reporting:**

The Target Audience was correctly identified and reaches the appropriate class members⁶. To begin, it is imperative to note that the target class definition used here i.e. Rifle Owners, is *over*-inclusive, as it includes *all* rifle owners, not just Remington rifle owners, or just owners of the particular Remington rifles subject to this settlement. This becomes an even more

⁶ I have been provided two other notice plans that were prepared for counsel when they were determining which notice provider to select in this matter. Those bids suggested the use of *identical* targeting i.e. Rifle Owners, as measured by MRI. The estimated reach of those plans, were between 70% and 80% respectively and each utilized both print publications and digital advertisements to achieve their stated reach.

telling statistic when juxtaposed against Remington's 2014 End of Year report, which indicated that the company only had a 22% market share of all rifle sales in North America. The reach percentage achieved in this case and reported to the Court was not reduced by market share, or brand, but rather, was keyed to the entire universe of all rifle owners in the U.S. Further, data from the leading objective syndicated data source available to media planners, MRI was used to verify the target audience and reach percentage. Specifically, the 2013 MRI Doublebase survey was used with regard to all media planning activity in order maintain consistency with the initial notice plan submitted to and approved by this Court.

11. Mr. Hilsee's suggestion that the magazine publications in this case only reached 48-49% of rifle owners is incorrect based on objective data from MRI. Utilizing data from the MRI 2013 Doublebase survey, the most current data available when the media plan was prepared for the parties' review, shows that the total print reach, measured against the over-inclusive class definition of "Rifle Owners," is firmly 57%.

12. The Hilsee Letter also erroneously argues that the magazine selections focused on men when, he suggests, women comprise as many as 30% of rifle owners. According to the previously identified syndicated data source which used consistently throughout this litigation, the rifle owner audience is actually 73% male and 27% female. Nevertheless the selected publications accounted for the uneven demographic distribution of class members. *Parade* readership, for instance, is 46% male and 54% female. Additionally, other titles included in the court-approved plan show female readership percentages between 10-21%. Thus, it is clear that women were given sufficient, appropriate and ample opportunity to view the notice in this settlement.

13. Mr. Hilsee also singles out and criticizes the geographic distribution of one particular publication from the many used in the Due Process Notice Program--*Parade* magazine. Attached for the Court's review as Exhibit "1" is a state-by-state circulation breakdown of *Parade's* readership. While Mr. Hilsee is accurate in that *Parade* is not circulated in every discrete sub-market that he artfully chose to highlight, it is distributed in the two "top 10" markets included in his list, with over 400,000 copies in each of those markets. In addition, when looking at the home states for each newspaper enumerated in his letter, it should be noted that *Parade* has coverage of 9-25% in each of those states, with the sole exception of Hawaii. Moreover, there has been no criticism leveled at any of the other nationally circulated publications utilized in this matter, or the nationwide banner advertisements. Simply stated, the geographic targeting was appropriate and any intimation otherwise is manufactured by highlighting the distribution schedule of one discrete publication.

14. Mr. Hilsee correctly identifies that media planners cannot merely "blend" or "mix" two different target audiences for reach and frequency calculations. However, his assertion is of no importance to the current due process evaluation, because this was not done here. Blending of audiences is improper advertising methodology because media professionals cannot calculate a multi-media reach and frequency when the audience is inconsistent between media types. This is considered *black letter law* in the media industry. Here, reach was calculated via a widely used industry program (IMS) as outlined above, and those calculations were based on the audience of "rifle owners" from a third-party, objective syndicated data source, MRI. IMS automatically calculates the reach across a combination of two or more media schedules to determine total campaign delivery. The automated process takes into account any

audience duplication that exists. Digital reach was not merely added to print reach; if we were merely adding reach, the purported total reach would have been much higher (95 %+).

15. The suggestion that target audiences were mixed may derive from Mr. Hilsee's apparent presupposition that the "men 35-64 with a household income of 75K+" audience was used for reach purposes. In fact, that audience was only used to determine the best digital networks to utilize for this campaign—not to calculate reach. Once these networks were determined, more advanced targeting was employed, such as demographic, purchase decision, keyword, contextual, and interests, to qualify the audience and ensure delivery to the class of "rifle owners." Moreover, contrary to the Hilsee Letter, comScore was not used to calculate reach and frequency, since the "rifle owners" audience is not available in comScore. However, based on the targeting criteria used to qualify the digital audience, the 38 million impressions served in this campaign reached 40.57% of rifle owners, far in excess of the 16.5%-17.4% implied in the Hilsee Letter.

16. In his letter, Hilsee suggests an incorrect alternative target for the internet banner ads. The Hilsee Letter suggests that the reach of the internet banner ads should have been measured against a wider adult population such as adults 18+. This is overbroad. Adults 18+ is an extremely expansive target audience typically used by lotteries and utility companies i.e. advertisers looking to cast as wide a net as possible. The target definition here, as explained above, is already over-inclusive in that it includes not just Remington rifle owners, but *all* rifle owners. Widening the audience would not only be quite costly it would be quite wasteful, particularly at the 90-95% reach Mr. Hilsee suggests as appropriate. That level of coverage, for that audience, could easily exceed \$25MM in media spend.

17. Mr. Hilsee was correct to point out the use of frequency capping in internet advertising. Here, frequency capping was utilized and was accurately accounted for in the campaign metrics. The campaign reporting did not however “falsely inflate the reach percentage” as claimed in the Hilsee Letter. Specifically, a frequency cap of 3x was applied and those exposures were taken into account through the standard random reach duplication formula, evidenced by the fact that the average frequency for this campaign was 3.5x—notably, higher than the 3x frequency cap employed. Therefore, any alleged concern with frequency capping is error.

18. Mr. Hilsee also bellows of “a great fraud” in the internet advertising market and cites astonishing numbers regarding non-human viewers of internet advertising. This is an irresponsible assertion. Non-human viewership is generally regarded to be minimal and our media plan employed sophisticated 3rd party verification sources such as Double Verify to safeguard against fraudulent views/actions. In reality, 84.7% of Rifle Owners have access to the internet at home and 84.2% have looked at or used the internet in the last 30 days. Additionally, compared to the general adult population, Rifle Owners are 7.1% more likely to have access to the internet at home using a computer and 5.4% more likely to have looked at or used the internet in the past 30 days.

19. For purposes of computing reach, the Hilsee Letter draws an intellectually dishonest distinction between those who clicked on the banner ads and those who viewed the ads without clicking on them. This distinction fails to account for the realities of current media best practices. Digital impressions are frequently used as an effective tool to create generalized awareness of a campaign and are not necessarily expected to drive click-through traffic—the sole metric Hilsee wishes to use as the measure of successful exposure. Rather, it is customary and

proper to count all impressions as exposure. In fact, many consumers do not click on banner ads when they are confronted with them, but will instead search for an advertised product/brand/service after seeing an ad. Engaging in such a search would lead class members to the dedicated case website where they could review the long form notice and other pertinent information. As such, only counting users who clicked through to the website from a banner ad is not an accurate measure of reach, and is incongruous with the way reach is consistently determined and reported in the digital advertising industry as a whole. Moreover, and perhaps more importantly, it must be recognized that all mechanisms for effectuating notice that are available to notice providers and advertisers, require the class member to engage in a multi-step processes. In response to this precise line of argument, which Mr. Hilsee unsuccessfully advanced as a defense-side expert witness, in trying to de-certify a recent class action, the notice provider in that case succinctly summarized the argument's fatal flaw:

The role of a notice effort is to provide an opportunity for class members to be exposed to a notice, not a guarantee. Mr. Hilsee argues that "the banner only provides notice to those who click it." In fact, (1) mailed notice only provides notice to recipients who choose to open **and** read the mail; (2) email notice only provides notice to the recipient who chooses to open **and** read the email; (3) publication notice only provides notice to readers who stop **and** read the notice; (4) radio broadcasts only provide notice to listeners who listen **and** comprehend the message **and** call to receive the notice by mail **and** open and read the notice when it arrives OR go to the case website **and** download **and** read it; and (5) television broadcasts only provide notice to viewers who watch/listen to commercials during the program break **and** call to receive the notice by mail **and** open **and** read the notice when it arrives OR go to the case website **and** download **and** read it.⁷

20. In sum, objective third party data, advanced digital targeting and state of the art media planning software were employed to compute and report an accurate, objectively

⁷ See, "Declaration of Daniel Burke," *infra*, n.1.

verifiable, reach percentage to the Court, which, the Court has already reviewed and approved, as being the best notice practicable under the circumstances. Nothing in the Hilsee Letter should change this Court's analysis.

21. **Individual Notice:**

The Hilsee Letter correctly identifies that individual notice by physical mail to be an effective and responsive means of notice. Mr. Hilsee includes various publications to support this point, including a publication where I was listed as a co-author. The problem, however, is that Mr. Hilsee did not have all the available factual information at his disposal when penning his memorandum. Likewise, it seems his grasp of the pertinent legal authority that governs his suggestion is quite loose. For instance, we have been advised that we were provided with the only targeted list of consumers with rifles at issue in this litigation (those who previously had trigger replacements performed at Remington and are entitled to a refund under the Settlement terms) that Remington could reasonably identify, which is precisely what is required under Rule 23. I am further advised that the subsequent mailing that will take place if this Court approves the supplemental reminder notice is an over-inclusive claims stimulations effort aimed at individuals who have contacted the company for various reasons (service center phone calls, company alert sign-ups on the Remington website, warranty registrations, repair requests), and is not limited to purchasers of firearms, much less the particular rifles at issue in this litigation, which is what Rule 23 requires. If such a list had existed, I would agree with Mr. Hilsee that it should be utilized.

22. However, it is clear that neither due process nor Rule 23 require class members to receive actual notice, as publication notice is appropriate where class members' names and

addresses cannot be determined with reasonable efforts. *See Juris v. Inamed Corp.*, 685 F.3d 1294, 1321 (11th Cir. 2012). Such is the case here.

23. Here, the notice plan satisfies Rule 23 and due process and, other federal courts have approved similar notice plans under manifestly similar circumstances. For example, in *Carter v. Forjas Taurus, et. al*, the District Court for the Southern District of Florida recently approved a substantially similar notice plan in a case involving firearms alleged to have defects that cause unintentional discharge when dropped or when the safety is on.⁸ The court in that case recognized that there is no national firearms registry and the defendant manufacturer's sale records do not provide the names of ultimate purchasers. The court instead, approved a notice plan strikingly similar the one used here. The plan used syndicated research methods to identify traditional, online, mobile and social media platforms to reach the settlement class members and only involved five components: widespread publication notice⁹, a press release, internet advertising, a settlement website, and a toll-free number, with the option of speaking to a live operator. All of those components are present here. Indeed, if this Court approves the supplemental reminder notice plan, the combined efforts here, will far outweigh the *Taurus* plan and will represent state-of-the-art, multi-media notice methodology, far in excess of plans utilized in comparable settlements.

24. Objectors in *Taurus*, failed to convince the court that actual and individual notice should have been required. The objectors argued that Defendant possessed product enrollment forms, NRA membership programs, and repair customers' email addresses – through which the

⁸ *See Carter v. Forjas Taurus S.A., et. al.*, No. 13-cv-24583-PAS (S.D. Fla.), "Order Granting Plaintiffs' Motion for Final Approval of Class Action Settlement", at Docket Entry 197.

⁹ In that case, the Court approved summary notice was published in national magazines, such as *American Rifleman*, *Guns & Ammo*, *Field & Stream*, *Sports Illustrated*, and *People*. The national magazines used in the Due Process Notice Program here, were *American Rifleman*, *Guns & Ammo*, *Field & Stream*, *American Hunter*, *Parade*, and *Athlon Sports*.

objectors' claimed, the defendant could have identified class members. The court found that individual notice was impracticable under the circumstances because the settlement class included owners and not just purchasers, the parties represented that the defendant had no current and reliable records of class members, and there is no national registry of gun owners. The court further found that the time and effort to have the defendant's staff put together a list of class members who have contacted them in the past would be grossly out of proportion to the negligible few class members located. Under such circumstances, the court concluded that the notice was appropriate. *See also Hughes v. Kore of Indiana Enter. Inc.*, 731 F.3d 672, 676-77 (7th Cir. 2013) (holding that notice by publication was adequate where the individual class members could not be identified with reasonable effort); *Poertner v. Gillette Co.*, 618 F. App'x 624, 630 (11th Cir. 2015) ("But even if it was possible to identify *some* unnamed class members, that does not mean that the district court lacked the discretion to approve the settlement as fair absent the identification of these class members.")

25. The *Taurus* court also granted final approval of the settlement without considering the response or claims rate. The court was satisfied with the parties' expert report which provided a valuation of the total settlement benefits that were available to class members as opposed to a valuation based on an anticipated claims rate, which is in line with several other decisions that have found that a settlement's fairness is not based on how many class members submit claims.¹⁰ *See also Hamilton v. SunTrust Mort., Inc.*, 2014 WL 5419507, at *7 (S.D. Fla. 2014) ("A settlement's fairness is judged by the *opportunity* created for the class members, *not by how many submit claims*. What matters is the settlement's value to each class member – it is ultimately up to class members to participate or not.") (emphasis added); *see also, Hall v. Bank*

¹⁰ *See*, "Order granting Plaintiffs' motion for final approval", *infra*, n. 8, at 22.

of Am., N.A., 2014 WL 7184039, at *8 (S.D. Fla. 2014) (“There may be many reasons or no reasons why class members decide to participate in a settlement.... Whatever the underlying reason, that is a decision to be made by each class member. Those decisions, however, do not affect whether the settlement provided to the [c]lass is fair, adequate, and reasonable.”).

26. Seeking the assistance of third-parties in effectuating the direct mailing campaign described in the Hilsee Letter is an effective tool that I have used in other settlements, as appropriate. However, it is not a viable or reasonable option for the Parties here. Hilsee suggests that the Parties should have used the names and addresses held by third-parties that may have been able and even willing to help get notices to class members if a request, or Order, were issued by the Court.

27. Specifically, Hilsee identifies three third parties that may have the names and addresses of class members – (1) federally licensed dealers (“Federal Firearms Licensee” or “FFL”), (2) the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“BATFE”), and (3) the National Rifle Association (“NRA”). However, Hilsee fails to acknowledge the enormous legal and practical barriers to his proposal. Namely, that the information Hilsee suggests should have been sought from FFLs and the BATFE is immune from legal process. I am also advised by counsel that the NRA does not sell its customer list.

28. I am advised by counsel that The Firearm Transaction Record for each gun purchase (ATF Form 4473) maintained by all operating FFLs and the BATFE are not subject to subpoena or other discovery, are inadmissible as evidence, are barred from being used, relied on, or disclosed in any manner, and cannot form the basis for any testimony or other evidence in a civil action in any state or federal court. *See*, CONSOLIDATED AND FURTHER CONTINUING APPROPRIATIONS ACT, 2012, PL 112-55, November 18, 2011, 125 Stat 552.

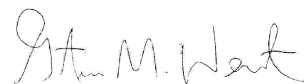
In short, I am advised that the Trace Reports and transaction records are based on and derived from information required to be kept by a Federal Firearms Licensee (FFL) pursuant to 18 U.S.C. § 923(g), and for this reason, and through the language of P.L. 112–55, Congress has expressly prohibited BATFE and FFLs from releasing such documents to the public and made them ultimately immune from legal process. *See, Fowlkes v. Bureau of Alcohol, Tobacco, Firearms & Explosives*, 139 F. Supp. 3d 287, 292 (D.D.C. 2015); *See also Abdeljabbar v. BATFE*, 74 F.Supp.3d 158, 174–75 (D.D.C.2014); *Smith v. BATFE*, No. 13–13079, 2014 WL 3565634, at *5 n. 2 (E.D.Mich. July 18, 2014); *Higgins v. U.S. Dep't of Justice*, 919 F.Supp.2d 131, 145 (D.D.C.2013).

CONCLUSION

29. It remains my opinion that the Due Process Notice Program comported with Federal Rule of Civil Procedure 23 and was the best notice practicable under the circumstances, including providing direct notice to all class members whose addresses could be identified through reasonable efforts. Moreover, when combined with the proposed supplemental reminder campaign, the class members here will have the benefit of an extremely comprehensive, integrated multi-media notice campaign that far exceeds virtually every similar known consumer settlement notice plan.

I declare under penalty of perjury that the above is true and correct.

Executed this 18th day of August, 2016.



STEVEN WEISBROT

Exhibit 1

Parade Circulation

Newspapers by State

Effective May 22, 2016

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Alabama	298,709	16%	The Anniston Star	Anniston	AL	17,640
			The Athens News Courier	Athens	AL	6,076
			The Birmingham News	Birmingham	AL	91,630
			The Cullman Times	Cullman	AL	7,091
			The Dothan Eagle	Dothan	AL	21,628
			The Gadsden Times	Gadsden	AL	14,896
			The Huntsville Times	Huntsville	AL	39,984
			Press-Register	Mobile	AL	65,660
			The Daily Home	Talladega	AL	6,664
			The Tuscaloosa News	Tuscaloosa	AL	27,440
Arkansas	233,198	20%	Daily Siftings Herald	Arkadelphia	AR	1,779
			Blytheville Courier News	Blytheville	AR	2,450
			Camden News	Camden	AR	2,556
			Log Cabin Democrat	Conway	AR	6,272
			Sunday News	El Dorado	AR	7,350
			AR Democrat - Fayetteville	Fayetteville	AR	52,430
			The Daily World	Helena	AR	1,922
			Hope Star	Hope	AR	1,400
			AR Democrat - Little Rock	Little Rock	AR	153,223
			Magnolia Banner-News	Magnolia	AR	2,380
Arizona	333,517	13%	Stuttgart Daily Leader	Stuttgart	AR	1,436
			Verde Independent & The Bugle	Cottonwood	AZ	3,381
			Arizona Daily Sun	Flagstaff	AZ	9,898
			The Kingman Daily Miner	Kingman	AZ	6,713
			Today's News-Herald	Lake Havasu	AZ	12,005
			East Valley Tribune	Mesa/Scottsdale	AZ	181,790
			The Daily Courier	Prescott	AZ	13,720
			News-Sun	Sun City	AZ	5,292
			The Arizona Daily Star	Tucson	AZ	88,272
			The Sun	Yuma	AZ	12,446
California	2,486,221	19%	The Bakersfield Californian	Bakersfield	CA	45,752
			Daily Republic	Fairfield	CA	14,592
			Fremont Argus	Fremont	CA	12,302
			The Fresno Bee	Fresno	CA	106,184
			The Sentinel	Hanford	CA	7,350
			Daily Review	Hayward	CA	15,455
			Lompoc Record	Lompoc	CA	2,646
			Los Angeles Times	Los Angeles	CA	744,989
			Merced Sun-Star	Merced	CA	12,365
			The Modesto Bee	Modesto	CA	56,311
			Register	Napa	CA	11,270
			Oakland Tribune	Oakland	CA	18,476
			Antelope Valley Press	Palmdale	CA	19,600
			Recorder	Porterville	CA	5,978
			Record Searchlight	Redding	CA	20,580
			Daily Independent	Ridgecrest	CA	3,920
			The Press Enterprise	Riverside	CA	113,885
			The Sacramento Bee	Sacramento	CA	201,142
			The San Diego Union-Tribune	San Diego	CA	243,865
			San Jose Mercury News	San Jose	CA	163,864
			The Tribune	San Luis Obispo	CA	26,728
			San Mateo County Times	San Mateo	CA	12,970
			Marin Independent Journal	San Rafael	CA	19,635

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
			The Orange County Register	Santa Ana	CA	291,060
			Santa Barbara News-Press	Santa Barbara	CA	21,070
			Santa Maria Times	Santa Maria	CA	9,800
			The Press Democrat	Santa Rosa	CA	50,138
			The Union Democrat	Sonoma	CA	10,290
			The Record	Stockton	CA	30,282
			Ventura County Star	Ventura	CA	52,637
			Daily Press	Victorville	CA	23,520
			Contra Costa Times	Walnut Creek	CA	113,218
			Siskiyou Daily News	Yreka	CA	4,347
Colorado	464,034	21%				
			Sunday Camera	Boulder	CO	20,882
			Canon City Daily Record	Canon City	CO	3,283
			The Gazette	Colorado Springs	CO	56,840
			The Denver Post	Denver	CO	282,569
			The Daily Sentinel	Grand Junction	CO	25,556
			Times-Call	Longmont	CO	12,822
			Reporter-Herald	Loveland	CO	17,000
			Montrose Daily Press	Montrose	CO	5,488
			The Pueblo Chieftain	Pueblo	CO	37,340
			The Chronicle-News	Trinidad	CO	2,254
Connecticut	205,117	15%				
			Journal Inquirer	Manchester	CT	30,380
			Record-Journal	Meriden	CT	11,760
			The Middletown Press	Middletown	CT	2,450
			Herald Press	New Britain	CT	9,016
			New Haven Register	New Haven	CT	64,190
			The Day	New London	CT	23,861
			Bulletin	Norwich	CT	17,906
			The Register Citizen	Torrington	CT	3,430
			Republican	Waterbury	CT	42,124
Washington DC	549,907	180%				
			The Washington Post	Washington	DC	549,907
Delaware	23,324	6%				
			State News Sunday	Dover	DE	23,324
Florida	1,694,321	21%				
			Bradenton Herald	Bradenton	FL	34,790
			Citrus County Chronicle	Crystal River	FL	27,708
			News-Journal	Daytona Beach	FL	81,162
			Northwest Florida Daily News	Ft Walton Beach	FL	23,520
			The Gainesville Sun	Gainesville	FL	30,403
			Florida Times-Union	Jacksonville	FL	91,601
			The Ledger	Lakeland	FL	46,550
			Daily Commercial	Leesburg	FL	19,110
			Live Oak Suwannee Democrat	Live Oak	FL	4,624
			The Miami Herald	Miami	FL	145,236
			Daily News	Naples/Bonita	FL	47,854
			Star-Banner	Ocala	FL	32,360
			Orlando Sentinel	Orlando	FL	195,129
			The News Herald	Panama City	FL	20,580
			Washington County News	Panama City/Weeklies	FL	24,010
			Herald-Tribune	Sarasota	FL	89,087
			St. Augustine Record	St Augustine	FL	15,680
			Tampa Bay Times	St Petersburg	FL	325,159
			Treasure Coast News	Stuart	FL	71,540
			The Tampa Tribune	Tampa	FL	196,694
			Daily Sun	The Villages	FL	59,780
			The Palm Beach Post	West Palm Beach	FL	111,744
Georgia	492,363	13%				
			Athens Banner-Herald	Athens	GA	13,720
			The Atlanta Journal-Constitution	Atlanta	GA	275,645

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
			The Augusta Chronicle	Augusta	GA	41,736
			Columbus Ledger-Enquirer	Columbus	GA	32,247
			Daily Citizen	Dalton	GA	10,780
			LaGrange Daily News	LaGrange	GA	6,123
			The Telegraph	Macon	GA	47,040
			The Milledgeville Union-Recorder	Milledgeville	GA	6,468
			The Moultrie Observer	Moultrie	GA	4,214
			Savannah Morning News	Savannah	GA	29,204
			Thomasville Times-Enterprise	Thomasville	GA	6,566
			The Tifton Gazette	Tifton	GA	4,704
			The Valdosta Daily Times	Valdosta	GA	13,916
Iowa	219,824	17%				
			The Tribune	Ames	IA	10,192
			The Gazette	Cedar Rapids	IA	50,881
			Clinton Herald	Clinton	IA	8,036
			Quad-City Times	Davenport	IA	39,788
			The Messenger	Fort Dodge	IA	14,014
			Knoxville Journal Express	Knoxville	IA	1,950
			Times-Republican	Marshalltown	IA	6,958
			Globe-Gazette	Mason City	IA	13,034
			Oskaloosa Herald	Oskaloosa	IA	2,352
			The Ottumwa Courier	Ottumwa	IA	9,310
Idaho	151,570	25%				
			Idaho Statesman	Boise	ID	48,510
			Post Register	Idaho Falls	ID	20,838
			Lewiston Morning Tribune	Lewiston/Clarkson	ID	22,540
			Idaho Press-Tribune	Nampa/Caldwell	ID	24,010
			Idaho State Journal	Pocatello	ID	15,386
			Standard Journal	Rexburg	ID	3,626
			The Times-News	Twin Falls	ID	16,660
Illinois	1,095,762	22%				
			The Telegraph	Alton	IL	15,656
			Belleville News-Democrat	Belleville	IL	43,610
			The Pantagraph	Bloomington	IL	32,634
			The Daily Ledger	Canton	IL	2,940
			The Southern Illinoisan	Carbondale	IL	24,990
			Carmi Times	Carmi	IL	2,548
			The News-Gazette	Champaign/Urbana	IL	38,201
			Chicago Tribune	Chicago	IL	602,838
			Commercial News	Danville	IL	9,310
			Herald & Review	Decatur	IL	38,416
			Edwardsville Intelligencer	Edwardsville	IL	3,430
			Effingham Daily News	Effingham	IL	8,820
			Daily Journal	Eldorado	IL	520
			The Journal Standard	Freeport	IL	6,762
			The Register-Mail	Galesburg	IL	8,036
			Daily Register	Harrisburg	IL	2,304
			Jacksonville Journal-Courier	Jacksonville	IL	9,653
			Daily Journal	Kankakee	IL	27,077
			Star Courier	Kewanee	IL	3,920
			The Macomb Journal	Macomb	IL	2,646
			Dispatch/Rock Island Argus	Moline	IL	33,810
			Daily Review Atlas	Monmouth	IL	1,274
			Mt. Vernon Register-News	Mount Vernon	IL	5,684
			Daily Mail	Olney	IL	2,860
			Pekin Daily Times	Pekin	IL	5,684
			Journal Star	Peoria	IL	57,083
			Daily Leader	Pontiac	IL	2,450
			Quincy Herald-Whig	Quincy	IL	19,208
			Register Star & Yes	Rockford	IL	39,200
			The State Journal-Register	Springfield	IL	44,198

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Indiana	414,237	16%	The Herald Bulletin	Anderson	IN	17,052
			The Batesville Herald Tribune	Batesville	IN	2,352
			The Herald Times	Bloomington/Bedford	IN	29,400
			The Republic	Columbus	IN	15,141
			Evansville Courier & Press	Evansville	IN	51,475
			The Journal Gazette	Fort Wayne	IN	73,010
			Daily Journal	Franklin	IN	11,393
			The Goshen News	Goshen	IN	8,232
			Daily Reporter	Greenfield	IN	7,448
			Greensburg News	Greensburg	IN	4,116
			Kokomo Tribune	Kokomo	IN	19,306
			The Lebanon Reporter	Lebanon	IN	4,155
			Pharos-Tribune	Logansport	IN	8,722
			Reporter-Times	Mooreville/Decatur	IN	2,744
			Times Of Northwest Indiana	Munster/Lake Co/Valp	IN	63,700
			The Evening News & The Tribune	New Albany	IN	9,408
			Rushville Republican	Rushville	IN	2,597
			The Tribune	Seymour	IN	5,782
			South Bend Tribune	South Bend	IN	58,800
			Tribune-Star	Terre Haute	IN	19,404
Kansas	208,386	18%	Daily Gazette	Augusta	KS	2,989
			Dodge City Globe	Dodge City	KS	3,065
			The Garden City Telegram	Garden City	KS	5,390
			The Hays Daily News	Hays	KS	7,252
			Hutchinson News	Hutchinson	KS	23,520
			Journal World	Lawrence	KS	12,642
			The Manhattan Mercury	Manhattan	KS	6,370
			McPherson Sentinel	McPherson	KS	2,577
			Kansan	Newton	KS	4,317
			The Ottawa Herald	Ottawa	KS	4,018
			Morning Sun	Pittsburg	KS	4,900
			The Pratt Tribune	Pratt	KS	1,330
			Salina Journal	Salina	KS	20,580
			Topeka Capital-Journal	Topeka	KS	27,440
			Wellington News	Wellington	KS	1,193
			The Wichita Eagle	Wichita	KS	80,803
Kentucky	189,609	11%	The Independent	Ashland	KY	12,809
			Kentucky Standard	Bardstown	KY	8,722
			Daily News	Bowling Green	KY	22,540
			Corbin Times-Tribune	Corbin	KY	3,920
			The News Enterprise	Elizabethtown	KY	16,660
			The Glasgow Daily Times	Glasgow	KY	6,370
			The Gleaner	Henderson	KY	7,335
			Kentucky New Era	Lexington	KY	8,820
			Herald-Leader	Lexington	KY	77,420
			The London Sentinel-Echo	London	KY	5,586
			The Ledger Independent	Maysville	KY	5,390
			Richmond Register	Richmond	KY	5,756
			Commonwealth Journal	Somerset	KY	8,281
Louisiana	266,794	15%	Bastrop Daily Enterprise	Bastrop	LA	2,464
			The Advocate	Baton Rouge	LA	119,560
			Beauregard Daily News	Deridder	LA	2,059
			The Courier	Houma	LA	14,073
			American Press	Lake Charles	LA	29,400
			The Leesville Daily Leader	Leesville	LA	1,522
			The Times-Picayune	New Orleans	LA	96,040
			Southwest Daily News	Sulphur	LA	1,676

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Massachusetts	672,141	25%	Boston Sunday Globe	Boston	MA	289,257
			The Enterprise	Brockton	MA	27,342
			Herald News	Fall River	MA	13,805
			Metrowest Daily News	Framingham	MA	18,326
			Gloucester Daily Times	Gloucester	MA	5,880
			Sunday Cape Cod Times	Hyannis/Cape Cod	MA	33,614
			Milford Daily News	Milford	MA	6,762
			Sunday Standard-Times	New Bedford	MA	22,050
			The Daily News Of Newburyport	Newburyport	MA	8,036
			Eagle tribune	North Andover	MA	27,048
			Patriot Ledger	Quincy	MA	41,367
			Salem News	Salem	MA	17,150
			Republican	Springfield	MA	86,240
			Taunton Daily Gazette	Taunton	MA	6,664
			Sunday Telegram	Worcester	MA	68,600
Maryland	411,264	18%	Annapolis Gazette	Annapolis	MD	4,900
			The Capital	Annapolis	MD	34,300
			The Sun	Baltimore	MD	254,800
			Cumberland Times-News	Cumberland	MD	21,070
			Star-Democrat	Easton	MD	16,170
			News-Post	Frederick	MD	29,400
			The Herald-Mail Newspapers	Hagerstown	MD	26,754
			Carroll County Times	Westminster	MD	23,870
Maine	98,588	17%	Kennebec Journal	Augusta	ME	8,820
			Sun Journal	Lewiston	ME	24,500
			Maine Sunday Telegram	Portland	ME	53,900
			Morning Sentinel	Waterville	ME	11,368
Michigan	608,790	15%	The Daily Telegram	Adrian	MI	12,250
			Ann Arbor News	Ann Arbor	MI	26,436
			Huron Daily Tribune	Bad Axe	MI	4,508
			The Bay City Times	Bay City	MI	25,529
			Tribune	Cheboygan	MI	3,430
			Reporter	Coldwater	MI	3,430
			Press & Guide	Dearborn	MI	14,172
			The Flint Journal	Flint	MI	47,631
			Gaylord Herald-Times	Gaylord	MI	3,920
			The Grand Rapids Press	Grand Rapids	MI	100,297
			Daily News	Hillsdale	MI	4,214
			Sentinel	Holland	MI	16,268
			Sentinel-Standard	Ionia	MI	1,791
			Citizen Patriot	Jackson	MI	23,626
			Kalamazoo Gazette	Kalamazoo	MI	37,591
			The County Press	Lapeer	MI	9,660
			The Mining Journal	Marquette	MI	12,250
			The Midland Daily News	Midland	MI	11,270
			The Monroe News	Monroe	MI	19,110
			The Macomb Daily	Mount Clemens	MI	42,405
			Morning Sun	Mount Pleasant	MI	8,673
			The Muskegon Chronicle	Muskegon	MI	25,106
			Petoskey News-Review	Petoskey	MI	7,252
			The Oakland Press	Pontiac	MI	34,118
			The Daily Tribune	Royal Oak	MI	4,565
			The Saginaw News	Saginaw	MI	27,495
			The Evening News	Sault Ste. Marie	MI	5,390
			The News-Herald	Southgate	MI	51,707
			Journal	Sturgis	MI	5,096
			Record-Eagle	Traverse City	MI	19,600

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Minnesota	830,290	38%	The Bemidji Pioneer	Bemidji	MN	7,252
			Brainerd Dispatch	Brainerd	MN	16,261
			Crookston Daily Times	Crookston	MN	1,205
			Duluth News-Tribune	Duluth	MN	37,240
			The Free Press	Mankato	MN	19,845
			Star Tribune	Minneapolis	MN	465,646
			The Journal	New Ulm	MN	6,762
			Red Wing Republican Eagle	Red Wing	MN	4,704
			Pioneer Press	St Paul	MN	245,650
			West Central Tribune	Willmar	MN	11,760
			Winona Daily News	Winona	MN	7,497
			Daily Globe	Worthington	MN	6,468
			Missouri	583,596	24%	Boonville Daily News
Lake Sun Leader	Camdenton	MO				4,116
Southeast Missourian	Cape Girardeau	MO				12,740
The Carthage Press	Carthage	MO				1,553
Constitution-Tribune	Chillicothe	MO				2,671
Missourian	Columbia	MO				4,018
The Daily Statesman	Dexter	MO				4,116
The Fulton Sun	Fulton	MO				3,038
Courier-Post	Hannibal	MO				4,639
News Tribune	Jefferson City	MO				16,490
The Joplin Globe	Joplin	MO				23,108
The Kansas City Star	Kansas City	MO				231,863
Kirksville Daily Express	Kirksville	MO				3,332
The Mexico Ledger	Mexico	MO				3,430
Monitor Index/Democrat	Moberly	MO				3,483
Neosho Daily News	Neosho	MO				2,098
Daily Journal	Park Hills	MO				6,076
Daily American Republic	Poplar Bluff	MO				9,310
Rolla Daily News	Rolla	MO				3,381
Democrat	Sedalia	MO				7,646
Standard Democrat	Sikeston	MO				5,880
St. Joseph News-Press	St Joseph	MO				25,480
St. Louis Post-Dispatch	St Louis	MO				197,960
Daily Guide	Waynesville	MO	798			
West Plains Daily Quill	West Plains	MO	5,292			
Mississippi	110,156	10%	Sun Herald	Biloxi/Gulfport	MS	27,111
			The Clarksdale Press Register	Clarksdale	MS	1,842
			The Commercial Dispatch	Columbus	MS	12,201
			Delta Democrat Times	Greenville	MS	7,448
			The Greenwood Commonwealth	Greenwood	MS	5,684
			Chronicle	Laurel	MS	4,116
			Enterprise-Journal	Mc Comb	MS	8,918
			The Meridian Star	Meridian	MS	9,702
			Northeast Mississippi Daily Journal	Tupelo	MS	33,134
Montana	97,466	22%	Billings Gazette	Billings	MT	31,360
			Bozeman Daily Chronicle	Bozeman	MT	14,308
			Montana Standard	Butte	MT	8,028
			Helena Independent Record	Helena	MT	9,130
			Daily Inter Lake	Kalispell	MT	15,040
			Missoulain	Missoula	MT	19,600
North Carolina	747,185	19%	Albemarle Stanley News & Press	Albemarle	NC	7,889
			The Courier Tribune	Asheboro	NC	11,760
			Times-News	Burlington	NC	21,560
			The Chapel Hill News	Chapel Hill	NC	17,150
			The Charlotte Observer	Charlotte	NC	152,207
			The Durham News	Durham	NC	59,780

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
North Carolina			The Fayetteville Observer	Fayetteville	NC	49,706
			Gaston Gazette	Gastonia	NC	20,580
			Goldsboro News-Argus	Goldsboro	NC	16,072
			The News & Record	Greensboro	NC	64,680
			The Daily Reflector	Greenville	NC	16,270
			Times-News	Hendersonville	NC	11,515
			News	Jacksonville	NC	14,504
			Free Press	Kinston	NC	8,820
			My. Airy News	Mr. Airy	NC	8,084
			Sun-Journal	New Bern	NC	13,230
			The News & Observer	Raleigh	NC	133,833
			The Star	Shelby	NC	8,134
			The Pilot	Southern Pines	NC	12,250
			Star-News	Wilmington	NC	40,180
			Winston-Salem Journal	Winston-Salem	NC	58,981
North Dakota	122,222	38%				
			Tribune	Bismarck	ND	24,010
			Devils Lake Daily Journal	Devils Lake	ND	2,842
			The Dickinson Press	Dickinson	ND	6,615
			The Forum	Fargo	ND	45,047
			Grand Forks Herald	Grand Forks	ND	23,814
			The Jamestown Sun	Jamestown	ND	4,900
			Minot Daily News	Minot	ND	14,994
Nebraska	234,485	31%				
			Sun	Beatrice	NE	3,920
			Telegram	Columbus	NE	6,076
			The Grand Island Independent	Grand Island	NE	17,542
			Journal Star	Lincoln	NE	52,431
			Norfolk Daily News	Norfolk	NE	12,642
			Sunday World-Herald	Omaha	NE	138,787
New Hampshire	79,527	15%				
			York News Times	York	NE	3,087
			Sentinel	Keene	NH	10,290
			New Hampshire News	Manchester	NH	47,089
			Portsmouth Herald	Portsmouth	NH	22,148
New Jersey	504,169	15%				
			The Press Of Atlantic City	Atlantic City	NJ	48,363
			The Record & Herald News	Bergen	NJ	120,050
			Suburban Trends	Hackensack	NJ	6,370
			The Jersey Journal	Jersey City	NJ	16,170
			The Star-Ledger	Newark	NJ	204,162
			New Jersey Herald	Newton	NJ	17,130
			Trentonian	Trenton	NJ	15,680
			The Times	Trenton	NJ	28,910
			Burlington County Times	Willingboro	NJ	22,344
New Mexico	122,455	15%	South Jersey Sunday	Woodbury	NJ	24,990
			Journal	Albuquerque	NM	95,550
			Clovis News Journal	Clovis	NM	6,178
			News-Sun	Hobbs	NM	6,958
			Los Alamos Monitor	Los Alamos	NM	2,940
			Portales News-Tribune	Portales	NM	1,519
New Mexico			Daily Record	Roswell	NM	9,310
Nevada	142,002	13%				
			Elko Daily Free Press	Elko	NV	5,782
Nevada			Las Vegas Review-Journal	Las Vegas	NV	136,220
New York	1,191,717	16%				
			Times Union	Albany	NY	102,858
			The Citizen	Auburn	NY	7,252
			The Daily News	Batavia	NY	10,290

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
			The Buffalo News	Buffalo	NY	196,000
			Messenger Post	Canandaigua	NY	7,840
			Daily Mail	Catskill	NY	2,461
			The Sunday Leader	Corning	NY	7,644
			Finger Lakes Times	Geneva	NY	14,455
			Post-Star	Glens Falls	NY	20,937
			The Leader-Herald	Gloversville	NY	9,800
			Herkimer Telegram	Herkimer	NY	3,920
			The Spectator	Hornell	NY	5,150
			Register-Star	Hudson	NY	4,247
			Freeman	Kingston	NY	12,740
			Lockport Journal	Lockport	NY	5,880
			The Malone Telegram	Malone	NY	3,920
			Times Herald-Record Sunday	Middletown	NY	52,430
			New York Daily News	New York	NY	465,500
			Niagra Gazette Sunday	Niagra Falls	NY	10,780
			Advance-News	Ogdensburg	NY	5,488
			The Oneida Daily Dispatch	Oneida	NY	4,116
			The Daily Star	Oneonta	NY	10,290
			Press-Republican	Plattsburgh	NY	13,426
			Saratogian	Saratoga Springs	NY	4,410
			Staten Island Advance	Staten Island	NY	38,220
			The Post-Standard	Syracuse	NY	108,605
			Record	Troy	NY	5,880
			Observer-Dispatch	Utica	NY	33,320
			Daily Times	Watertown	NY	21,560
			Wellsville Daily Reporter	Wellsville	NY	2,298
Ohio	927,690	20%	Akron Beacon Journal	Akron	OH	94,080
			Ashland Times-Gazette	Ashland	OH	10,780
			Ashtabula Star Beacon	Ashtabula	OH	11,760
			The Sunday Jeffersonian	Cambridge	OH	10,045
			The Repository	Canton	OH	50,759
			The Plain Dealer	Cleveland	OH	252,421
			Dayton Daily News	Dayton	OH	104,977
			The Crescent-News	Defiance	OH	15,680
			Sunday Review	East Liverpool	OH	5,978
			The Chronicle-Telegram	Elyria	OH	22,540
			The Courier	Findlay	OH	16,057
			Review-Times	Fostoria	OH	2,528
			Journal News	Hamilton	OH	24,108
			The Lima News	Lima	OH	31,443
			Morning Journal	Lorain	OH	17,640
			Journal Tribune	Marysville	OH	5,880
			The Times Reporter	New Philadelphia	OH	16,660
			Salem News	Salem	OH	4,018
			Springfield News-Sun	Springfield	OH	18,228
			The Blade	Toledo	OH	110,035
			Lake County News-Herald	Willoughby	OH	31,360
			The Daily Record	Wooster	OH	20,996
			The Vindicator	Youngstown	OH	49,717
Oklahoma	314,415	21%	Daily Ardmoreite	Ardmore	OK	8,858
			Claremore Daily Progress	Claremore	OK	4,900
			News and Eagle	Enid	OK	11,834
			McAlester News-Capitol	McAlester	OK	6,370
			Miami News-Record	Miami	OK	4,900
			Muskogee Phoenix	Muskogee	OK	9,408
			Norman Transcript	Norman	OK	9,158
			The Oklahoman	Oklahoma City	OK	143,959
			The Pryor Daily Times	Pryor	OK	3,381
			Stillwater Press	Stillwater	OK	5,758
			Tahlequah Daily Press	Tahlequah	OK	3,136
			Tulsa World	Tulsa	OK	98,980
			Woodward News	Woodward	OK	3,773

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Oregon	310,989	19%	Democrat-Herald & Corvallis Gazette Times	Albany	OR	18,816
			The Bulletin	Bend	OR	25,480
			The World	Coos Bay	OR	6,860
			The Register-Guard	Eugene	OR	48,349
			Herald And News	Klamath Falls	OR	14,798
			Mail Tribune	Medford	OR	19,992
			Argus Observer	Ontario	OR	5,194
			The Oregonian	Portland	OR	171,500
Pennsylvania	1,610,775	32%	The Morning Call	Allentown	PA	113,434
			Beaver County Times	Beaver	PA	26,460
			Gazette	Bedford	PA	10,621
			The Sentinel	Carlisle	PA	8,820
			The Intelligencer	Doylestown	PA	27,048
			Tri-County Sunday	Du Bois	PA	13,720
			The Express-Times	Easton	PA	45,080
			Erie Times-News	Erie	PA	53,883
			Gettysburg Times	Gettysburg	PA	8,820
			Patriot-News	Harrisburg	PA	94,080
			Hazleton Standard-Speaker	Hazleton	PA	15,043
			The Wayne Independent	Honesdale	PA	2,842
			The Daily News	Huntingdon	PA	8,854
			The Tribune-Democrat	Johnstown	PA	28,910
			New Era Intelligencer Journal Sunday News	Lancaster	PA	79,870
			Latrobe Bulletin	Latrobe	PA	7,870
			Bucks County Courier Times	Levittown/Bristol	PA	35,672
			Meadville Tribune	Meadville	PA	10,584
			New Castle News	New Castle	PA	12,250
			Times Herald	Norristown	PA	17,150
			The Philadelphia Inquirer	Philadelphia	PA	320,778
			Philadelphia Daily News	Philadelphia DN	PA	41,157
			Pittsburgh Post-Gazette	Pittsburgh	PA	214,380
			Mercury	Pottstown	PA	13,524
			Pottsville Republican Herald	Pottsville	PA	20,580
			Delaware County Daily Times	Primos	PA	23,520
			Reading Eagle	Reading	PA	66,409
			Scranton Times-Tribune	Scranton	PA	45,080
			The Shamokin-Pottsville News-Item	Shamokin	PA	7,350
			The Herald	Sharon	PA	16,170
			St College Centre Daily Times	State College	PA	20,580
			Pocono Record	Stroudsburg	PA	14,896
			The Daily Item	Sunbury	PA	20,090
			Towanda Sunday Review	Towanda	PA	7,840
			Tyrone Daily Herald	Tyrone	PA	1,666
			Herald-Standard	Uniontown	PA	23,391
			Washington Observer Reporter	Washington	PA	33,320
			The Record Herald	Waynesboro	PA	5,684
			Daily Local News	West Chester	PA	16,464
			The Times Leader	Wilkes Barre	PA	28,177
			Citizen's Voice	Wilkes-Barre	PA	25,678
			Williamsport Sun-Gazette	Williamsport	PA	23,030
Rhode Island	83,349	20%	The Providence Journal	Providence	RI	83,349
South Carolina	335,554	17%	Anderson Independent-Mail	Anderson	SC	23,720
			The Post And Courier	Charleston	SC	76,440
			The State	Columbia	SC	70,100
			Georgetown Times	Georgetown	SC	4,900
			The Index-Journal	Greenwood	SC	11,270
			The Island Packet	Hilton Head Island	SC	24,500
			Lancaster News	Lancaster	SC	10,512
			The Sun News	Myrtle Beach	SC	38,728

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
			The Times & Democrat	Orangeburg	SC	9,114
			The Herald	Rock Hill	SC	17,760
			Herald-Journal	Spartanburg	SC	35,280
			The Item	Sumter	SC	13,230
South Dakota	55,854	16%				
			American News	Aberdeen	SD	11,564
			The Daily Republic	Mitchell	SD	10,535
			Rapid City Journal	Rapid City	SD	23,030
			Watertown Public Opinion	Watertown	SD	10,725
Tennessee	395,370	15%				
			Chattanooga Times Free Press	Chattanooga	TN	76,409
			Cleveland Daily Banner	Cleveland	TN	13,720
			Columbia Daily Herald	Columbia	TN	10,500
			Crossville Chronicle	Crossville	TN	7,742
			The State Gazette	Dyersburg	TN	4,116
			The Williamson Herald	Franklin	TN	6,860
			Johnson City Press	Johnson City	TN	24,500
			Knoxville News Sentinel	Knoxville	TN	87,024
			Southern Standard	McMinnville	TN	9,310
			The Commercial Appeal	Memphis	TN	110,070
			Citizen Tribune	Morristown	TN	23,547
			Oak Ridge	Oak Ridge	TN	4,471
			Shelbyville Times-Gazette	Shelbyville	TN	6,713
			The Sunday News	Tullahoma	TN	10,388
Texas	1,442,547	15%				
			Abilene Reporter-News	Abilene	TX	20,588
			Amarillo Globe-News	Amarillo	TX	26,950
			Athens Daily Review	Athens	TX	3,920
			Austin American-Statesman	Austin	TX	117,982
			Brownsville Herald	Brownsville	TX	13,230
			Brownwood Bulletin	Brownwood	TX	4,900
			Bryan Times	Bryan	TX	22,288
			Corpus Christi Caller-Times	Corpus Christi	TX	37,240
			Corsicana Daily Sun	Corsicana	TX	3,822
			The Dallas Morning News	Dallas	TX	229,908
			Denton Record-Chronicle	Denton	TX	8,820
			Star-Telegram	Fort Worth	TX	183,505
			Gainesville Daily Register	Gainesville	TX	4,606
			Greenville Herald Banner	Greenville	TX	4,900
			Valley Morning Star	Harlingen	TX	11,956
			The Leader	Houston	TX	30,380
			Houston Community	Houston	TX	433,461
			The Huntsville Item	Huntsville	TX	3,332
			Jacksonville Daily Progress	Jacksonville	TX	2,156
			Kerrville Daily Times	Kerrville	TX	7,350
			Killeen Daily Herald	Killeen	TX	18,506
			Lubbock Avalanche-Journal	Lubbock	TX	28,910
			Monitor	McAllen	TX	27,172
			Reporter-Telegram	Midland	TX	14,210
			The Mineral Wells Index	Mineral Wells	TX	9,016
			Odessa American	Odessa	TX	11,760
			Palestine Herald-Press	Palestine	TX	4,557
			The Paris News	Paris	TX	6,370
			Plainview Daily Herald	Plainview	TX	2,842
			Standard-Times	San Angelo	TX	16,660
			Stephenville Empire-Tribune	Stephenville	TX	3,528
			Temple Daily Telegram	Temple	TX	17,640
			Gazette	Texarkana	TX	25,454
			Tyler Courier-Times-Telegraph	Tyler	TX	19,306
			Victoria Advocate	Victoria	TX	21,070
			The Waxahachie Daily Light	Waxahachie	TX	3,430
			Mid Valley Town Crier	Weslaco	TX	21,467
			Times Record News	Wichita Falls	TX	19,355

State	Circulation	% Cov	Newspaper Name	City	State	Circulation
Utah	159,159	17%	The Herald Journal	Logan	UT	13,230
			Daily Herald	Provo	UT	26,264
			The Salt Lake Tribune-Deseret News	Salt Lake City	UT	119,665
Virginia	457,360	14%	Daily Press	Newport News/Hampton	VA	86,716
			The Virginian-Pilot	Norfolk	VA	142,590
			The Petersburg Progress-Index	Petersburg	VA	10,780
			Richmond Times-Dispatch	Richmond	VA	141,814
			The Roanoke Times	Roanoke	VA	75,460
Washington	603,804	21%	The Daily World	Aberdeen	WA	7,150
			The Bellingham Herald	Bellingham	WA	19,404
			Kitsap Sun	Bremerton	WA	17,640
			Daily Record	Ellensburg	WA	5,684
			The Daily News	Longview	WA	15,380
			Skagit Valley Herald	Mount Vernon	WA	13,703
			The Olympian	Olympia	WA	22,540
			Tri-City Herald	Pasco/Tri Cities	WA	27,146
			The Seattle Times	Seattle	WA	240,100
			The Spokesman-Review	Spokane	WA	76,651
			The News Tribune	Tacoma	WA	73,500
			The Columbian	Vancouver	WA	30,810
			Walla Walla Union-Bulletin	Walla Walla	WA	11,662
			The Wenatchee World	Wenatchee	WA	16,758
			Herald-Republic	Yakima	WA	25,676
Wisconsin	202,293	9%	Baraboo News Republic	Baraboo	WI	3,283
			Daily Citizen	Beaver Dam	WI	8,820
			Chippewa Valley Newspapers	Chippewa Falls	WI	5,684
			Leader-Telegram	Eau Claire	WI	23,520
			Kenosha News	Kenosha	WI	24,000
			La Crosse Tribune	La Crosse	WI	25,578
			Wisconsin State Journal	Madison	WI	86,124
			Daily Register	Portage	WI	3,724
			The Journal Times	Racine	WI	21,560
West Virginia	183,995	24%	The Register-Herald	Beckley	WV	14,700
			Bluefield Daily Telegraph	Bluefield	WV	13,720
			Gazette-Mail	Charleston	WV	44,100
			Clarksburg Exponent-Telegram	Clarksburg	WV	17,738
			Times West Virginian	Fairmont	WV	7,840
			Mineral Daily News Tribune	Keyser	WV	2,680
			The Journal	Martinsburg	WV	14,210
			The Dominion Post	Morgantown	WV	18,326
			The Parkersburg News And Sentinel	Parkersburg	WV	22,344
			Princeton Times	Princeton	WV	1,387
			Sunday News-Register	Wheeling	WV	26,950
Wyoming	25,084	10%	Casper Star-Tribune	Casper	WY	18,342
			Daily Rocket-Miner	Rock Springs	WY	6,742

Total Circulation 22,991,184

Source: Parade newspaper carrier list effective 5/22/2016